

REMARKS

Applicants thank the Examiner for the continued careful consideration of the subject application. The Office Action mailed November 26, 2008 has been carefully considered. In this Office Action, Claims 1-18 and 22-25 are pending. Claims 22 and 23 were rejected under 35 USC 103(a). Claims 1-18, 24 and 25 are allowed. Applicants thank the Examiner for the notice of the allowable subject matter. Claims 22 and 23 have been amended and these amendments are supported by, at least, the application at pages 12 and 13. In light of the aforementioned amendments and arguments presented herein, Applicants respectfully request reconsideration, removal of the rejections of Claims 22 and 23, and that these claims also be placed in condition for allowance.

The Office Action rejected Claims 22 and 23 under 35 USC 103(a) as being unpatentable over Bahrs, (U.S. Pat. No. 6,901,554) hereinafter Bahrs, in view of “*What are Enterprise JavaBeans components?: Part 1: The history and goals of EJB architecture*,” hereinafter Norby, and further in view of Chang (U.S. 6,968,503) herein after Chang. Applicants assert that the cited art, in isolation or in combination does not teach, suggest, or disclose the claimed invention and may not be used as a proper 35 USC 103 rejection. Claims 22 and 23 are the rejected independent claims.

In *Teleflex v. KSR*, the Supreme Court stated that a proper 35 USC 103 rejection requires the following steps be performed: (1) Determining the scope and content of the prior art; (2) Ascertaining the differences between the claimed invention and the prior art; and (3) Resolving the level of ordinary skill in the pertinent art. *Teleflex Inc. v. KSR Int’l Co.* 127 S.Ct. 1727, 1741,

82 USPQ.2d 1385, 1396 (2007). This three part test has also been reemphasized and promulgated in the Federal Register. *Federal Register*, Vol. 72, No. 195.

Applying the first step of KSR test to determine the scope and the content of the cited art, Applicants first address the scope and content of Bahrs. Bahrs states he provides a “method and apparatus in a data processing system for displaying a component or container.” Abstract. More particularly Bahrs states he “provides an architectural pattern for creating applications for a data processing system.” “Processes for presenting the plurality of components and receiving user input are handled by a first set of graphical objects, wherein in response to selected user input, a first event is generated.” (Col. 2, 55-56).

Bahrs describes that an “[a]rchitectural pattern includes a View Controller which provides a display of a component, container or bean on a data processing system . . . View controller basically provides a reusable GUI element containing graphical components such as text fields . . . to be displayed for viewing and interact by a user. However, Bahrs also states that “The key to successful implementation . . . is the proper division of the application into logical subsystems.” Where “[t]his division should be driven by the analysis of the application’s domain.” “For example, using an object oriented analysis of the application’s domain, set of use cases can be developed.” Applicants respectfully assert that Bahrs focuses on providing different ViewControllers based on application domain specific information.

With respect to the second step of KSR and Bahrs, Applicants respectfully assert that Bahrs does not teach, at least, “wherein the creation of each UI record occurs on the server-side API without user input on any client device of the plurality of client devices and further wherein

the information in each UI record depends on the type of the respective client.” Applicants respectfully assert that the Examiner agrees with these assertions in the Office Action at page 4.

Applying the first step of KSR test to determine the scope and the content of the cited art, Applicants now address the scope and content of Norby. Norby states he provides “an overview of Enterprise JavaBeans (EJB technology enabling readers to gain a quick understanding of essential concepts).” Page 1. The Office Action states that Norby discloses that “an EJB component can be developed once and then deployed on multiple platforms without recompilation or source code modification.” Applicants believe that the Office Action cited Norby to disclose that an application can be developed once and deployed multiple times. Applying the second step of KSR to Norby, Applicants respectfully assert that Norby does not cure the deficiencies of Bahrs as outlined above, nor does the Office Action assert this. Specifically, Applicants assert that Norby does not disclose “wherein the creation of each UI record occurs on the server-side API without user input on any client device of the plurality of client devices and further wherein the information in each UI record depends on the type of the respective client.”

Applying the first step of KSR test to determine the scope and the content of the cited art, Applicants now address the scope and content of Chang. Chang states he provides “use of [an] XML namespace [which] allows users to easily modify the user interface and how content is handled without needing to contact the manufacturer of the workflow ser or engage in a massive redesign of the server.” That is, Chang states his “present invention provides an XML-based user interface that allows users to describe the requests to the workflow server for any combination of the WFS without ever changing the ARS [Application Request Server].”

With respect the second step of KSR, the differences between Chang and the current invention, Applicants respectfully assert that Chang does not disclose, at least, “wherein the creation of the given UI record occurs on the server-side API without user input on the client device and further wherein the information in the UI record depends the type of the respective client.” Specifically, Applicants would assert that with respect to Change, his invention requires “users to describe the requests” and that this occurs on the client side. Conversely, the current invention claims “creation of each UI record occurs on the server-side API without user input” and the “information in each UI record depends the type of the respective client” not based on user input. Applicants respectfully assert that Chang does not disclose this feature of the current invention.

Applicants therefore assert that none of the cited references, together or in isolation, teach the claimed invention. Applicants further assert that one skilled in the relevant computer arts would not bridge the gap to arrive at the current invention. Therefore, Applicants respectfully assert that these references, in combination or in isolation, fail to satisfy the 35 USC 103 test as promulgated by the Supreme Court in KSR. As a result, Applicants assert that this 35 USC 103 rejection is improper and respectfully request it be removed and independent Claims 22, and 23 be placed in condition for allowance.

Applicant: Coach Wei, *et al.*
U.S.S.N.: 10/017,183
Filing Date: 12/07/2001
EMC Docket No.: EMC-06-235(PRO)ORD1

Conclusion

In view of the foregoing, the Applicants believe that the application is in condition for allowance and respectfully request favorable reconsideration.

In the event the Examiner deems personal contact desirable in the disposition of this case, the Examiner is invited to call the undersigned attorney at (508) 293-7450.

Please charge all fees occasioned by this submission to Deposit Account No. 05-0889.

Respectfully submitted,

Dated: February 26, 2009

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